

EXHIBIT 4

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

KEVIN RISTO, on behalf of)
himself and all others) Case No.
similarly situated,) 2:18-cv-07241-CAS-PLA
Plaintiff,)
vs.)
SCREEN ACTORS GUILD-)
AMERICAN FEDERATION OF)
TELEVISION AND RADIO)
ARTISTS, a Delaware)
corporation, et al.,)
Defendants.) (Pages 1-168)
-----)

VIRTUAL VIDEOCONFERENCE
VIDEOTAPED DEPOSITION OF
KEVIN RISTO
FRIDAY, JANUARY 29, 2021
10:04 A.M.

REPORTED BY:

SUSAN NELSON

C.S.R. No. 3202

JOB NO. 4420543

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1 Virtual videoconference videotaped deposition of
2 KEVIN RISTO, the witness, taken on behalf of
3 Defendants, commencing at 10:04 A.M., on FRIDAY,
4 JANUARY 29, 2021, at Las Vegas, Nevada, before SUSAN
5 NELSON, C.S.R. No. 3202.

6
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15 ALSO APPEARING (VIA VIDEOCONFERENCE):

16 DAVE HALVORSON, VIDEOGRAPHER

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1 its work that we're, you know, 14:32:38
2 entrusted to do by the 14:32:40
3 participants, to get that money out 14:32:41
4 to them. And, you know, that's a 14:32:43
5 huge value. Again, I can't say" -- 14:32:45
6 she's saying it's "incalculable is 14:32:49
7 not the word." 14:32:51
8 If you scroll down further below, she 14:32:51
9 states: 14:32:53
10 "As far as I know, there's not 14:32:54
11 another source that we could obtain 14:32:55
12 that information from." 14:32:57
13 Are you aware of any source that has as 14:32:59
14 comprehensive a repository, collective repository of 14:33:01
15 the unions regarding session report information and 14:33:05
16 musician information? 14:33:09
17 A. For the unions? No. 14:33:12
18 Q. So do you have any basis to contradict or 14:33:14
19 doubt Ms. Taub's assertion that the information 14:33:19
20 provided by the unions cannot be obtained from any 14:33:23
21 other source? 14:33:29
22 MR. LIFSCHITZ: Argumentative. And calls 14:33:31
23 for a legal conclusion. Also assumes facts not in 14:33:41
24 evidence. 14:33:42
25 THE WITNESS: Sorry, repeat the question. 14:33:59

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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3
4
5 I, KEVIN RISTO, hereby declare under the
6 penalties of perjury of the laws of the United States
7 that the foregoing is true and correct.

8 Executed this 25 day of
9 March, 2021, at
10 Las Vegas, Nevada, California.

11
12 DocuSigned by:
13 
14 A34CD99A91B1463...

15 KEVIN RISTO
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1 STATE OF CALIFORNIA)
2 COUNTY OF LOS ANGELES) ss.

3 I, SUSAN NELSON, C.S.R. 3202, in and for the
4 State of California, do hereby certify:

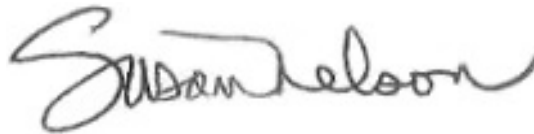
5 That, prior to being examined, the witness named
6 in the foregoing deposition was by me duly sworn to
7 testify the truth, the whole truth and nothing but
8 the truth; that said virtual videoconference
9 videotaped deposition was taken down by me
10 stenographically at the time and place therein named,
11 and thereafter transcribed via computer-aided
12 transcription under my direction, and the same is a
13 true, correct and complete transcript of said
14 proceedings;

15 Before completion of the deposition, review
16 of the transcript [X] was [] was not requested. If
17 requested, any changes made by the deponent (and
18 provided to the reporter) during the period allowed
19 are appended hereto.

20 I further certify that I am not interested in
21 the event of the action.

22 Witness my hand this 19th day of February, 2021.

23



24

Susan Nelson, C.S.R. No. 3202
Certified Shorthand Reporter
State of California

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